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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

SEP 16 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	CC Docket. No. 95-116
)	
Telephone Number Portability)	RM 8535
)	
)	FCC 96-286

REPLY

The National Exchange Carrier Association, Inc. (NECA)¹ files herein its reply comments to the Telephone Number Portability Further Notice of Proposed Rulemaking, released July 2, 1996 (FNPRM).² In its FNPRM, the Commission generally discusses proposed rules and makes inquiries regarding the types of costs and cost recovery involved with providing long-term number portability. Among other things, the Commission specifically discusses types of cost recovery for both shared-facility and direct carrier-specific costs, including methods that would require a funding mechanism involving carrier contributions.³

Several parties filed comments supporting cost recovery methods that would require a shared

¹ NECA is a not-for-profit association that is responsible, under the Commission's rules, for the administration of the interstate Universal Service and Lifeline Assistance programs, and the interstate Telecommunications Relay Services (TRS) fund. See 47 C.F.R. §§ 69.603 and 64.604. NECA also prepares access charge tariffs on behalf of over 1,200 telephone companies that do not file separate tariffs; and collects and distributes access charge revenues. See *id.*

² Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, RM 8535, FCC 96-286 (rel. July 2, 1996).

³ *Id.* at ¶¶ 212-225.

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funding mechanism.⁴ For example, USTA recommends that certain costs “be submitted to a national administrator, who would then assess a charge on all telecommunications carriers, allocated by each carriers’ gross telecommunications revenues.”⁵ The Personal Communications Industry Association (PCIA) stated that “the fund itself should be collected and disbursed on a centralized basis” and that this “will facilitate the compliance of individual carriers with their funding . . .”⁶ Bell Atlantic “proposes that [costs] be recovered in a manner similar to that the Commission established to recover the costs of telecommunications relay services (‘TRS’).”⁷ The California PUC and Time Warner advocate regional recovery of shared costs.⁸

Based on the support in the record for recovery of number portability costs through some type of shared funding mechanism, the Commission may decide to adopt one or more such methods. Should the Commission adopt a shared funding approach, NECA would be willing to administer the necessary fund(s). NECA would be the logical choice to administer such a fund(s) based on its administration of the similar TRS fund in an efficient, competitively-neutral manner in compliance

⁴ Bell Atlantic at 1-2, BellSouth at 8, California PUC at 5-6, General Services Administration at 5-6, GTE at 12, ITCs at 2-3, Nynex at 9-10, Personal Communications Industry Association at 6-7, SBC at 11, Time Warner at 7-8, and USTA at 12.

⁵ USTA at 12.

⁶ PCIA at 6-7.

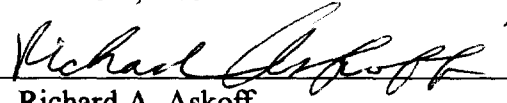
⁷ Bell Atlantic at 1-2.

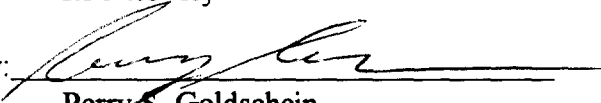
⁸ California PUC at 2, 5-6, Time Warner at 7-8.

with Commission rules, as well as its significant related experience in collecting and validating funding data, on-site audits, and billing, collecting and redistributing funds.

Respectfully submitted,

NATIONAL EXCHANGE CARRIER
ASSOCIATION, INC.

By:  ²⁰
Richard A. Askoff
Its Attorney

By: 
Perry S. Goldschein
Regulatory Manager

September 16, 1996

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition was served this 16th day of September, 1996, by first class mail or by hand delivery to the persons listed below.

By 
Perry Goldschein

The following parties were served:

William F. Caton*
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554
(Original and Fourteen Copies
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Common Carrier Bureau
1919 M Street, N.W., Room 518
Washington, D.C. 20554
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International Transcription Service (ITS)*
2100 M Street, N.W., Suite 140
Washington, D.C. 20037

James S. Blaszak, Esq.
Levine, Blaszak, Block and Boothby
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036
Attorneys for Ad Hoc Telecommunications Users
Committee

Carl W. Northrop
Christine M. Crowe
Paul, Hastings, Janofsky & Walker LLP
1299 Pennsylvania Avenue, NW
10th Floor
Washington, DC 20004-2400

Richard J. Metzger
General Counsel
Association for Local Telecommunications Services
1200 19th Street, NW, Suite 560
Washington, DC 20036

Larry A. Peck Frank M. Panek
Counsel for Ameritech
Room 4H86
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

John M. Goodman
Attorney for Bell Atlantic
1133 20th Street, NW
Washington, DC 20036

M. Robert Sutherland
Richard M. Sbaratta
Theodore R. Kingsley
BellSouth Corporation and BellSouth
Telecommunications, Inc.
Suite 1700
1155 Peachtree Street, NW
Atlanta, GA 30309-3610

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
People of the State of California and the Public
Utilities Commission of the State of California
505 Van Ness Avenue
San Francisco, CA 94102

Virginia J. Taylor
Staff Counsel
California Department of Consumer Affairs
400 R Street, Suite 3090
Sacramento, CA 95814-6200

Christopher J. Wilson
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Anthony Marquez, Esq.
First Assistant Attorney General
Colorado Public Utilities Commission
1580 Logan Street
Office Level 2
Denver, CO 80203

Thorvald A. Nelson
Colorado Office of Consumer Counsel
1580 Logan Street, Suite 610
Denver, CO 80203

Michael Altschul
Vice President and General Counsel
Randall S. Coleman
Vice President, Regulatory Policy & Law
Cellular Telecommunications Industry Association
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Cynthia B. Miller
Senior Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael J. Shortley, III
Attorney for Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Emily C. Hewitt
General Counsel
Vincent L. Crivella
Associate General Counsel
Michael J. Ettner
Senior Assistant General Counsel
Jody B. Burton
Assistant General Counsel
Personal Property Division
General Services Administration
18th & F Streets, NW, Room 4002
Washington, DC 20405

David J. Gudino, HQE03F05
GTE Service Corporation
P. O. Box 152092
Irving, TX 75015-2092

David A. Irwin
Irwin, Campbell & Tannenwald, P.C.
1730 Rhode Island Avenue, NW
Suite 200
Washington, DC 20036
Attorney for ITC

Loretta J. Garcia
Donald J. Elardo
MCI Telecommunications Corporation MCI Metro
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Andrew D. Lipman
Erin M. Reilly
Swidler & Berlin, Chartered
3000 K Street, NW, Suite 300
Washington, DC 20007
Attorneys for MFS Communications Company, Inc.

Eric Witte, Missouri Bar No. 39361
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

David Cosson
L. Marie Guillory
The National Telephone Cooperative Association
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Lisa M. Zaina
Stuart Polikoff
The Organization for the Promotion and
Advancement of Small Telecommunications
Companies
21 Dupont Circle, NW
Suite 700
Washington, DC 20036

Maureen O. Helmer
General Counsel
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223

Robert S. Foosaner
Senior Vice President,
Government Affairs
Lawrence R. Krevor
Director-Government Affairs
Laura L. Holloway
General Attorney
Nextel Communications, Inc.
800 Connecticut Avenue, NW
Suite 1001
Washington, DC 20006

Campbell L. Ayling
The NYNEX Telephone Companies
1111 Westchester Avenue
White Plains, NY 10604

Betty D. Montgomery
Attorney General of Ohio
Ann E. Henkener
Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793
Attorneys for Public Utilities Commission of Ohio

Mark J. Tauber
Mark J. O'Connor
Piper & Marbury, L.L.P.
1200 19th Street, NW
Seventh Floor
Washington, DC 20036
Attorneys for Omnipoint Communications, Inc.

Marlin D. Ard
Nancy Woolf
Pacific Telesis Group
140 New Montgomery Street
Room 1530A, 15th Floor
San Francisco, CA 94105

Mark J. Golden
Robert L. Hoggarth
Personal Communications Industry Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314-1561

James D. Ellis
Robert M. Lynch
David F. Brown
SBC Communications, Inc.
175 E. Houston Room 1254
San Antonio, TX 78205

Durward D. Dupre
Mary W. Marks
Southwestern Bell Telephone Company
One Bell Center
Room 3558
St. Louis, MO 63101

Bruce Beard
Southwestern Bell Mobile Systems
17330 Preston Road
Suite 100A
Dallas, TX 75252

Susan Drombetta
Manager - Rates and Tariffs
Scherers Communications Group, Inc.
575 Scherers Court
Worthington, OH 43085

Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
Sprint Corporation
1850 M Street, NW
Suite 1110
Washington, DC 20036

Teresa Marrero, Esq.
Senior Regulatory Counsel
Teleport Communications Group, Inc.
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Brian Conboy
Sue D. Blumenfeld
Thomas Jones
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036
Attorneys for Time Warner Communications
Holdings, Inc.

J. Roger Wollenberg
John H. Harwood, II
Jonathan J. Frankel
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420
Attorneys for U S. West, Inc.

Mary McDermott
Linda Kent
Charles D. Cosson
Keith Townsend
U. S. Telephone Association
1401 H Street, NW
Suite 600
Washington, DC 20005

Dana Frix
Katherine A. Rolph
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007
Attorneys for WinStar Communications, Inc.

* Hand Delivered